



PROCESS OVERVIEW

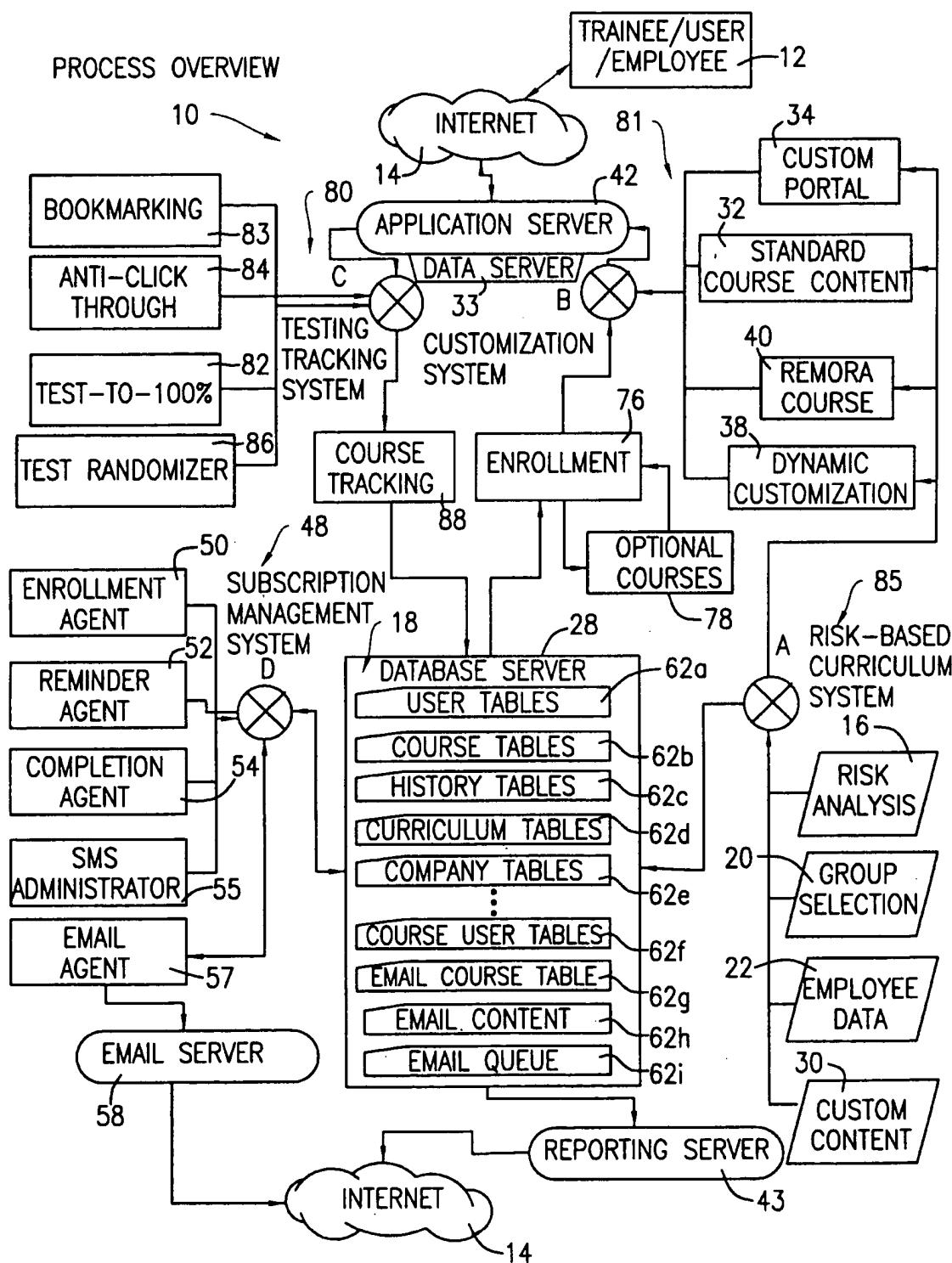


FIG. 1

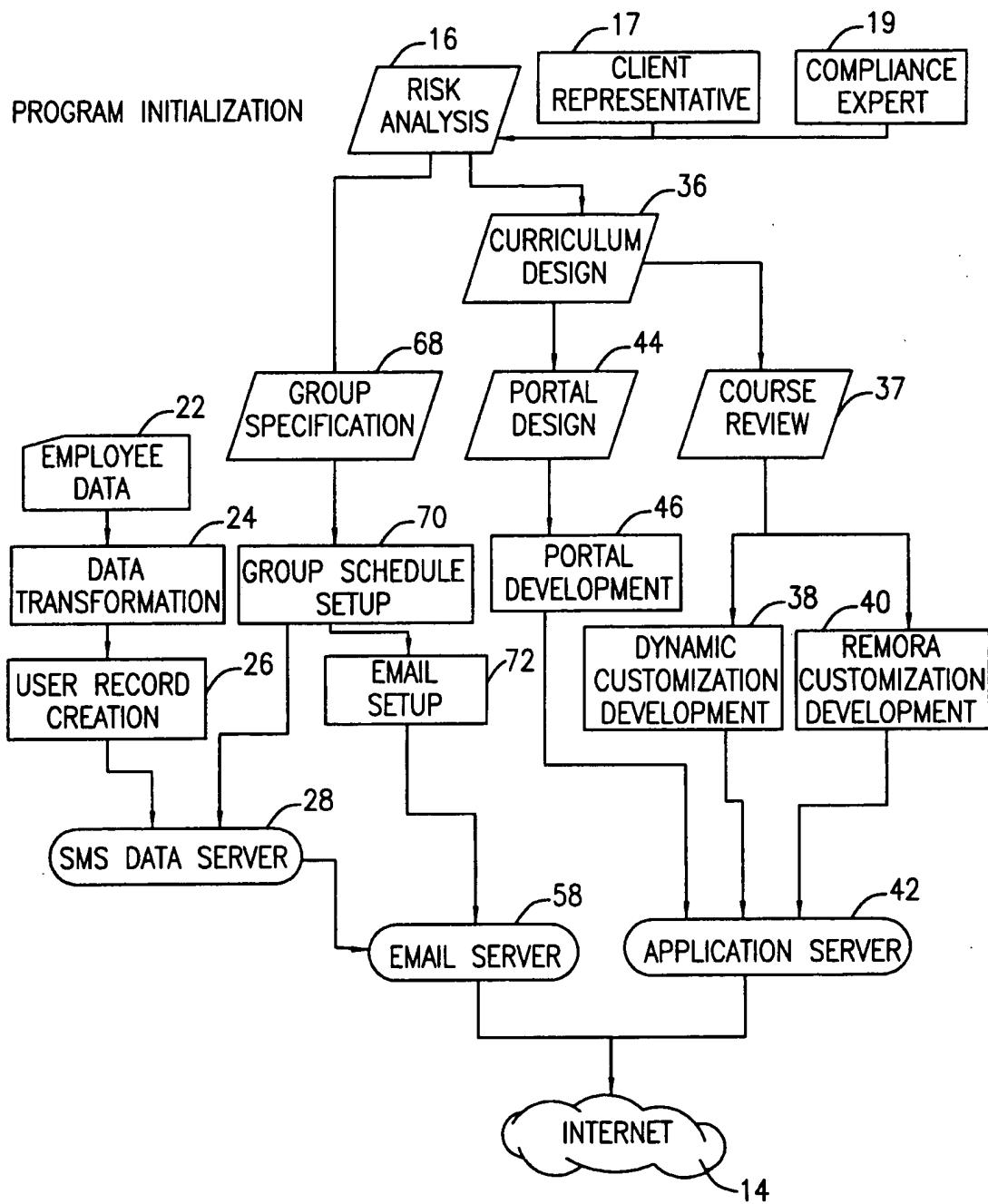
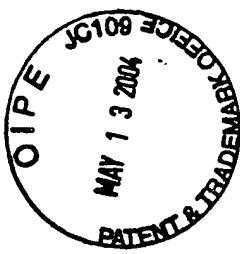


FIG. 2



TRAINING DELIVERY

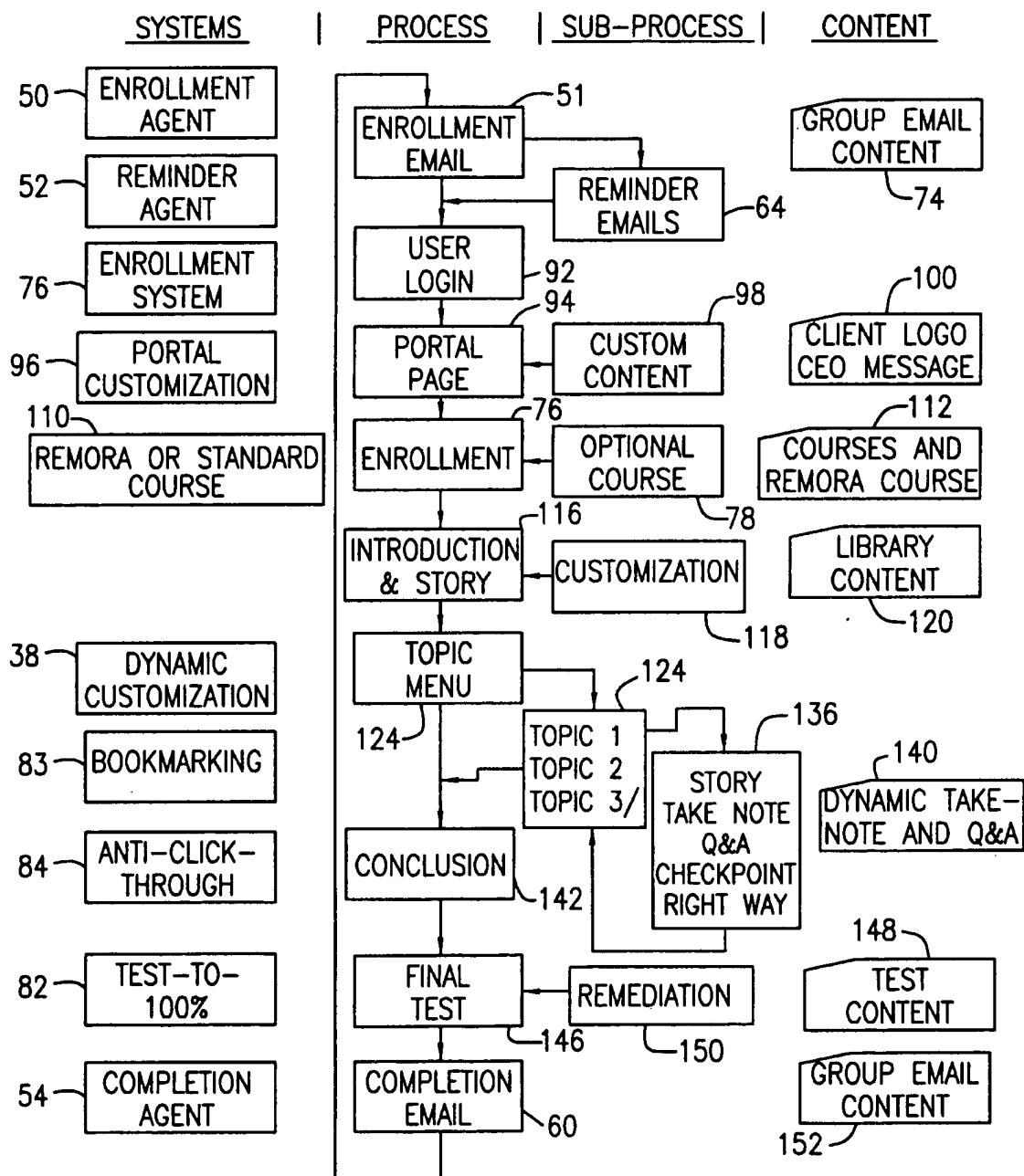
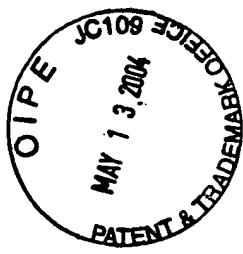


FIG. 3



XYZ CORPORATION

ETHICS AND COMPLIANCE PORTAL

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WELCOME. PAUL SMITH!



WELCOME TO XYZ CORPORATION'S ETHICS AND COMPLIANCE PORTAL. OUR COMPANY IS COMMITTED TO CONDUCTING BUSINESS ACCORDING TO HIGH ETHICAL PRINCIPLES AND PRACTICES. HERE AT XYZ, WE TREAT ONE ANOTHER, OUR CLIENTS, AND OUR COMMUNITY WITH RESPECT.

ON THIS PAGE, THERE ARE TOOLS, TRAINING, INFORMATION, AND OTHER RESOURCES TO HELP YOU DO YOUR JOB IN A WAY THAT SUPPORTS XYZ'S VALUES. PLEASE TAKE A FEW MINUTES TO EXPLORE THIS PAGE. WHEN RICHARD ANDERSON YOU ARE READY TO TAKE THE TRAINING, CLICK ON STEP 1, LOCATED ON THE RIGHT-HAND SIDE OF THIS PAGE. IF YOU HAVE QUESTIONS OR COMMENTS, WE ENCOURAGE YOU TO USE THE "CONTACT US" LINK BELOW.

LOGOFF

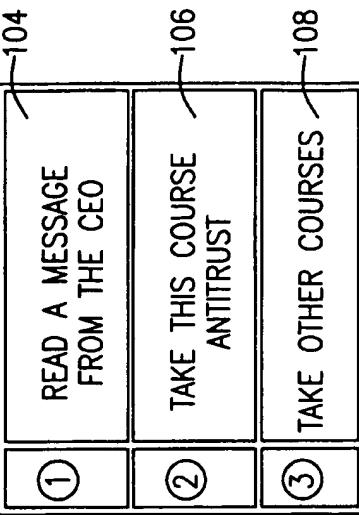
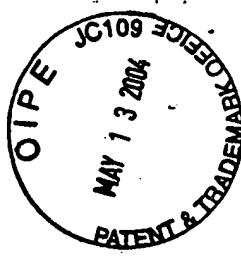


FIG. 4

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ANTITRUST COURSE MENU

ANTITRUST

CLICK ON INSTRUCTIONS. THEN COMPLETE ALL MENU ITEMS. A CHECKMARK WILL
APPEAR BESIDE EACH MENU ITEM WHEN COMPLETED.

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PRICE DISCUSSIONS
RYAN TALKS WITH A COMPETITOR ABOUT PRICING

126
DISCUSSING COMPETITIVE ISSUES
RYAN'S DISCUSSION TURNS TO DISCOUNTS

TRADE ASSOCIATION DANGERS
RYAN'S SPEAKS "OFF-THE-RECORD" WITH A COMPETITOR

BID RIGGING & ALLOCATION
RYAN AND COMPETITOR AGREE TO ALLOCATE BIDS

WORKING WITH SUPPLIERS
RYAN DISCUSSES COMPETITIVE INFORMATION WITH A SUPPLIER

INSTRUCTIONS

E-MAIL IS FOREVER
RYAN SENDS HIS ASSOCIATE A DANGEROUS E-MAIL

CONCLUSION
REVIEW, TEST, CERTIFICATE

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FIG. 5



TRADE ASSOCIATION DANGERS

ANTITRUST

DIRECTIONS: READ THE TEXT, CLICK UNDERLINED WORDS, AND COMPLETE ITEMS 1–5.

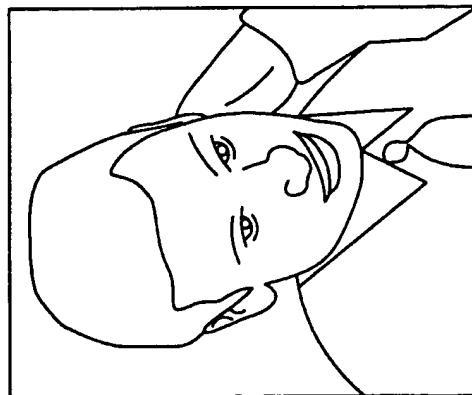
NEVER CONDUCT "OFF-THE-RECORD" DISCUSSIONS WITH A COMPETITOR.

THE GOVERNMENT'S EVIDENCE IN PRICE-FIXING CASES OFTEN CAN BE TRACED TO TRADE ASSOCIATION MEETINGS. WHEN IT COMES TO POSSIBLE ANTI-COMPETITIVE CONDUCT, NOTHING'S "OFF-THE-RECORD."

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SOME OTHER KEY TRADE ASSOCIATION RULES:

- TRADE ASSOCIATION MEETINGS ARE NO PLACE FOR PEOPLE WHO DON'T UNDERSTAND THE ANTITRUST RULES. DON'T GO IF YOU HAVEN'T HAD ANTITRUST TRAINING OR IF YOU DON'T KNOW THE RISKS.
- TRADE ASSOCIATION AGENDAS, MINUTES OR STANDARD-SETTINGS ACTIVITIES SHOULD BE REVIEWED BY AN ANTITRUST LAWYER.
- IF SOMEONE BEGINS TO DISCUSS A DANGEROUS SUBJECT (e.g., PRICE), DON'T JUST SIT THERE! LOUDLY SAY THAT THE DISCUSSION IS IMPROPER AND THAT YOU ARE LEAVING. THEN GET OUT OF THERE AND CALL YOUR COMPANY'S LEGAL COUNSEL.



RYAN ASKS TOM TO KEEP THEIR DISCUSSIONS "OFF-THE-RECORD"...

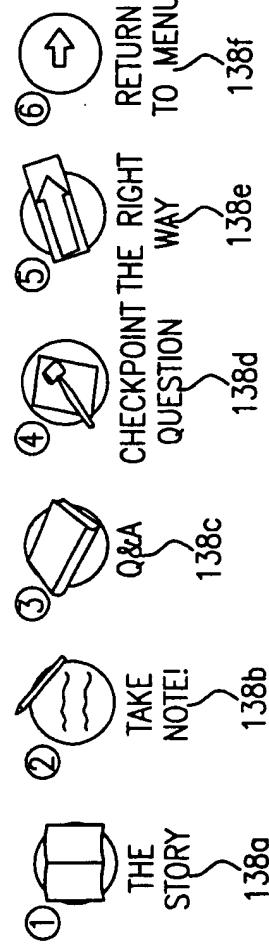


FIG. 6